

heavily cites and references Defendants' Motion, Dkt 42, which is currently under seal, Dkt 44. Mr. Gonzales seeks to avail himself of those facts while abiding by the terms of the joint protective order.

Mr. Gonzales also asks to seal the supplemental report of his expert, Dr. Mark Heath. That short supplement was generated after Dr. Heath became subject to the protective order in this case and reviewed Director Lumpkin's confidential deposition and the summary judgment motions. His initial report is not being filed under seal because it does not rely on confidential information.

Allowing Mr. Gonzales to file these documents under seal will not prejudice or hinder Defendants in litigating this case. Mr. Gonzales will provide Defendants' counsel with copies of these filings.

Dated this 20th day of June, 2022.

Respectfully submitted,

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CERTIFICATE OF WORD COUNT

Counsel certifies that the body of this Motion contains 171 words, according to his word-processing program.

/s/ *Jeremy Schepers*
Jeremy Schepers

CERTIFICATE OF CONFERENCE

Counsel certifies that he conferred with opposing counsel, Leah O’Leary, who informed the undersigned that Defendants are unopposed to the relief requested in this Motion.

/s/ *Jeremy Schepers*
Jeremy Schepers

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2022, I sent a true and correct copy of the foregoing was filed in this Courts CM/ECF system, which will serve Leah O’Leary, counsel for the Defendants, at leah.oleary@oag.texas.gov.

/s/ *Jeremy Schepers*
Jeremy Schepers